

**EXHIBIT  
B**

**From:** [Matt Mussalli](#)  
**To:** [Ron Sommers](#)  
**Cc:** [Iain Kennedy](#)  
**Subject:** FW: Hui  
**Date:** Wednesday, October 19, 2022 2:55:23 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[ClientStatement-3231698702.pdf](#)

---

Ron, per your request and further the claim previously sent to you by email on this matter, attached is a summary of all invoices through September 30. Our clients are current in all payment obligations and have actually paid all amounts billed; however, as you know, we tried the case early this month and incurred a significant amount of fees both in trial prep and trial, and to a much lesser extent, in some post-trial matters. On behalf of our clients, we are seeking indemnity for all attorney's fees and expenses incurred. Therefore, we will be supplementing this email with our October invoices for services rendered during the month of October.

The share file link below will take you to each invoice. Please note that these are unredacted and as we did not have a permissible claim for recovery of attorney's fees in the lawsuit, they were neither requested nor produced. Although the relevant indemnity clause is not limited to only "reasonable" attorney's fees, I hope that upon your review, it is readily apparent that the tasks performed were appropriate and hourly rates and fees were reasonable.

We have not yet received a decision from the court yet but will keep you posted, and let you know if we elect to file suit in state court. If you have any questions or are in a position to sign a) either a tolling agreement or b) another agreement that our clients' claim has been received, is timely and Dongtai Investments Group, LLC will not be asserting a SOL defense, then we would be pleased to draft same and defer filing suit, to the extent that might even be necessary.

Thanks.

Matt

The Mussalli Law Firm  
2441 High Timbers Drive, Suite 220  
The Woodlands, TX 77380  
(281) 651-5577  
(832) 218-1171 (Fax)  
[Matt@MussalliLaw.com](mailto:Matt@MussalliLaw.com)  
[www.MussalliLaw.com](http://www.MussalliLaw.com)




In response to the CDC guidelines and local government orders, The Mussalli Law Firm has implemented changes to our existing in-office work schedules and staffing protocols for the health, safety and welfare of our valued team members and clients and to do our part in stopping the spread of COVID-19. We remain committed to serving our clients' needs, including as may be necessary on a time-sensitive basis. We are closely monitoring all pending

litigation matters and keeping in frequent contact with court staff to ensure proper flow of cases and noting any scheduling changes. Although we have ceased all in-office client meetings, we have made appropriate technology adjustments to continue to meaningfully communicate remotely, but even those systems have proven to be overburdened at times, by the sheer volume of users. In the event you do not receive a timely reply to any communication, kindly email [admin@mussallilaw.com](mailto:admin@mussallilaw.com) and include "URGENT" in the subject line and we will expedite any necessary action on our part.

We appreciate your patience while we work together to prudently manage the existing circumstances.

signature\_2977550682



This Message and any attachments are sent from a law firm and may contain information that is confidential and protected from disclosure by privilege. If you are not the intended recipient, you are prohibited from printing, copying, forwarding or saving this communication or any portion hereof. Please permanently delete the message without printing, copying, forwarding or saving this communication and notify the author immediately by telephone at the number above. Thank you.

---

**From:** Becky Cohn <[becky@mussallilaw.com](mailto:becky@mussallilaw.com)>  
**Date:** Wednesday, October 19, 2022 at 3:00 PM  
**To:** Matt Mussalli <[matt@mussallilaw.com](mailto:matt@mussallilaw.com)>  
**Subject:** Hui

<https://mussallilaw.sharefile.com/d-s45a4bb9aa10a480aaf0b08c23d2ee6da>

*Becky Cohn*  
**Office Manager**  
**The Mussalli Law Firm**  
[www.mussallilaw.com](http://www.mussallilaw.com)  
**2441 High Timbers Drive, Suite 220**  
**The Woodlands, Texas 77380**  
**(281) 651-5577 (voice)**  
**(832) 218-1171 (fax)**  
[Send a file securely to our firm](#)

***\*Please note: we are moving. Effective November 1, 2022, our office will be at 24 Waterway, Suite 830, The Woodlands, Texas 77380.***

This Message and any attachments are sent from a law firm and may contain information that is confidential and protected from disclosure by privilege. If you are not the intended recipient, you are prohibited from printing, copying, forwarding or saving this communication or any portion hereof. Please permanently delete the message

without printing, copying, forwarding or saving this communication and notify the author immediately by telephone at the number above. Thank you.

**Hui: HOSPITALITY UNLIMITED INVESTMENTS, INC.**

<b>Invoice #</b>	<b>Date</b>	<b>Matter</b>	<b>Amount</b>
20142019	11/30/2018	Intergroup Realty	\$ 1,481.30
20152019	12/31/2018	Intergroup Realty	\$ 3,093.40
26382019	4/30/2019	Intergroup Realty	\$ 2,327.55
28112019	5/31/2019	Intergroup Realty	\$ 3,127.43
31322019	7/31/2019	Intergroup Realty	\$ 2,699.72
32042019	8/31/2019	Intergroup Realty	\$ 1,716.65
38122019	12/31/2019	Intergroup Realty	\$ 362.10
44142020	3/31/2020	Intergroup Realty	\$ 4,094.55
45322020	4/30/2020	Intergroup Realty	\$ 1,475.35
46662020	5/31/2020	Intergroup Realty	\$ 812.50
47312020	6/30/2020	Intergroup Realty	\$ 945.00
49292020	7/31/2020	Intergroup Realty	\$ 4,326.05
49772020	8/31/2020	Intergroup Realty	\$ 675.00
50922020	10/2/2020	Intergroup Realty	\$ 225.00
52102020	10/31/2020	Intergroup Realty	\$ 340.00
56302021	1/31/2021	Intergroup Realty	\$ 952.25
63512021	4/30/2021	Intergroup Realty	\$ 272.50
68192021	6/30/2021	Intergroup Realty	\$ 585.00
69122021	7/31/2021	Intergroup Realty	\$ 497.80
76332021	11/30/2021	Intergroup Realty	\$ 356.25
77792022	12/31/2021	Intergroup Realty	\$ 408.15
80322022	2/28/2022	Intergroup Realty	\$ 770.95
81842022	3/31/2022	Intergroup Realty	\$ 206.40
85482022	6/30/2022	Intergroup Realty	\$ 360.00
89522022	8/31/2022	Intergroup Realty	\$ 4,084.20
90582022	9/30/2022	Intergroup Realty	\$ 26,112.61
		<b>Total</b>	<b>\$ 62,307.71</b>